

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TONY KOLE and GHOST INDUSTRIES, LLC, )  
an Illinois limited liability company, )  
  )  
  )  
Plaintiffs, )  
  )  
  )      Case No. 11 CV 3871  
v. )  
  )  
  )  
VILLAGE OF NORRIDGE, an Illinois municipal )  
corporation, )  
  )  
  )  
Defendant. )

**MOTION FOR LEAVE TO FILE MEMORANDUM IN SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION**  
**AND**  
**LOCAL RULE 7.1 MOTION TO FILE BRIEF IN EXCESS OF FIFTEEN PAGES**

NOW COME the Plaintiffs, Tony Kole and Ghost industries, LLC, an Illinois limited liability company, and, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure (F.R.Civ.P. 15(a)(2)), move this Honorable Court to grant Plaintiffs leave to file their Memorandum in Support of their Motion for Preliminary Injunction and, pursuant to Local Rule 7.1, to file said Memorandum in excess of 15 pages. In support thereof, Plaintiffs state as follows:

1.     Plaintiffs filed a Third Amended Complaint and a Motion for Preliminary Injunction on January 31, 2014. However, due to the number and complexity of the constitutional issues involved in this matter, and despite much diligence and effort, Plaintiffs were unable to complete the supporting Memorandum until February 9, 2014.
2.     This matter is set for hearing on the Motion for Preliminary Injunction on March 7, 2014, in part because there is a temporary restraining order in place until April 1, 2014.

3. Plaintiffs will be severely prejudiced if they are unable to present their arguments in favor of their request for a preliminary injunction to the Court, and request leave to file the attached proposed Memorandum, *instanter*.

4. In addition, Plaintiffs attempted to edit and cut the Memorandum as much as possible, but due to the multitude and complexity of issues Plaintiffs request leave to file the Memorandum with the attached 27 pages.

5. Plaintiffs have no objection to Defendant taking an equal extension of time, and an equal number of pages for any Response brief.

6. Plaintiffs believe the matter can still be heard on March 7, 2014.

WHEREFORE, the Plaintiffs, Tony Kole and Ghost Industries, LLC, an Illinois limited liability company, request this Honorable Court to grant Plaintiffs leave to file their Second Amended Complaint, *instanter*, as well as any and all further relief as this Court deems just and proper.

Dated: February 9, 2014

Respectfully submitted,

By: \_\_\_\_\_ /s/ David G. Sigale  
Attorney for Plaintiffs

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**CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING**

The undersigned certifies that:

1. On February 9, 2014, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale

Attorney for Plaintiffs

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